

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
Shawanda Tatum	:	CHAPTER 13
Debtor	:	
	:	No. 18-15183-jkf

ANSWER TO MOTION OF M&T BANK FOR RELIEF FROM AUTOMATIC STAY

Debtor, by her attorney, Erik B. Jensen, Esq. by way of answer to Movant's motion, respectfully represents that:

1-2. Admitted.

3. Denied. Averment 3 is a legal conclusion, to which the applicable rules of civil procedure do not require a response. Strict proof is demanded at time of hearing.

4. Admitted.

5-10. Denied. These averments contain legal conclusions, to which the applicable rules of civil procedure do not require a response. To the extent not a legal conclusion, it is specifically denied that Debtor owes the amounts stated herein. Strict proof is demanded at time of hearing.

WHEREFORE, Debtor respectfully requests that this Honorable Court enter an order denying Movant's Motion for Relief from Automatic Stay with Prejudice.

Date: 7/10/19

Respectfully submitted.

/S/ Erik B. Jensen
Erik B. Jensen, Esq.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Answer to Motion for Relief was served on July 10, 2019, on the Chapter 13 Standing Trustee, Scott Waterman, Esquire and Kevin G. McDonald, Esquire by electronic mail.

Date: 7/10/19

/s/ Erik B. Jensen
Erick B. Jensen, Esq.
Attorney for Debtor